

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

DESHAWN PETERSON

Case: 2:21-mj-30017
Assigned To : Unassigned
Assign. Date : 1/12/2021
CMP: USA v PETERSON (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 12, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 922(g)(1)	Felon in posession of a firearm

This criminal complaint is based on these facts:

See Affidavit

Continued on the attached sheet.

Kimberly Olech

Complainant's signature

Special Agent Kimberly Olech
Printed name and title

Elizabeth A. Stafford

Judge's signature

Elizabeth Stafford, United States Magistrate Judge
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 12, 2021

City and state: Detroit, MI

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kimberly Olech, having been duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since 2018. I am currently assigned to the Detroit field office, assigned to the Violent Gang Task Force (VGT) and charged with investigating gangs and narcotics trafficking. Prior to my present assignment, I was a police officer for the City of Tucson in Arizona.

2. I am submitting this affidavit in support of a criminal complaint alleging that DESHAWN PETERSON has violated Title 18, United States Code Section 922(g)(1), felon in possession of a firearm, and Title 18, United States Code, Section 3147, committing an offense while on pretrial release. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge as well as

information provided to me by other law enforcement agents and witnesses.

BACKGROUND ON INVESTIGATION

4. The FBI Violent Gang Task Force is conducting a criminal investigation concerning the “It’s Just Us” street gang for violations of Title 18, United States Code, Section 1962 (Racketeering Influenced Corrupt Organizations Act); Title 18, United States Code, Section 1959 (Violent Crimes in Aid of Racketeering); Title 21, United States Code, Sections 841 and 846 (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances).

5. A federal grand jury has indicted IJU leader, Duane Peterson, and IJU members, Melvin Brown and Demonte Foster, with racketeering conspiracy in violation of Title 18 USC Section 1962(d) for IJU-related gang activity. Duane Peterson and Melvin Brown were also indicted with fellow IJU member DESHAWN PETERSON, and others, for conspiring to distribute heroin as part of IJU’s narcotics trafficking enterprise.

6. Following the return of PETERSON’s federal indictment, the Detroit FBI Violent Gang Task Force (VGTF) executed a federal arrest

warrant at PETERSON's residence on October 22, 2020. Agents arrested PETERSON and seized his phones.

7. Following PETERSON's arraignment on these charges and a detention hearing, a federal magistrate released PETERSON pursuant to the Bail Reform Act of 1966. The magistrate further notified PETERSON of the effect of committing a crime while on pretrial release.

8. On October 26, 2020, I searched PETERSON's phone pursuant to a federal search warrant.

9. In reviewing the contents of PETERSON's cell phone, I discovered evidence of fraudulent financial activity. For instance, in one chat thread PETERSON sent several photographs of debit cards issued from various state unemployment agencies. Some of the cards were in PETERSON's name. Other cards were in the name of fellow IJU member Jermaine Jenkins. Two cards listed the name of identity theft victim, Peter Wilson. An additional photograph depicted a card bearing the name, Timothy Meyers, a person who my investigation has confirmed has no apparent association with Detroit, or with PETERSON.

10. On January 11, 2021, a federal search warrant was obtained for PETERSON's residence.

11. FBI agents executed the warrant on January 12, 2021, at approximately 6:00 AM. After police knocked and announced their presence, PETERSON's girlfriend answered the front door. A short time later PETERSON walked from the basement to the front door and complied with law enforcement directives. After the residence was secured, law enforcement began a search of the home looking for evidence of identity theft. During the search, a firearm was located in a plastic tote tucked around clothing. The plastic tote was on the floor of PETERSON's bedroom closet. Additionally, in the bottom drawer of a nightstand in the same bedroom, agents located 40 rounds of 9mm ammunition and a pistol magazine. This bedroom also contained mail in PETERSON's name, as well as his clothing. PETERSON's girlfriend, Jasmine Joyce, stated she and PETERSON shared the bedroom. Joyce also stated PETERSON uses two of her cell phones, which were located in the bedroom as well. After the search, PETERSON was brought into that bedroom to retrieve some clothes since he was going to be transported to the Marshals.

12. The firearm located during the search of PETERSON's bedroom was a Sig Sauer P365 pistol, caliber 9mm, serial number 66A805199. There was one round in the chamber and seven (7) rounds in the magazine.

13. Since PETERSON has been previously convicted of a felony, he is therefore prohibited from possessing a firearm under 18 U.S.C. § 922(g).

14. On January 12, 2021, based on information that I provided, Alcohol Tobacco and Firearms (ATF) Special Agent Michael Jacobs, an Interstate Nexus Expert, reviewed the history of the above-noted firearm and a preliminary examination indicates that the firearm was most likely manufactured outside the State of Michigan and thus, had previously traveled in interstate commerce.

15. Based on the facts set forth above, I believe that probable cause exists to conclude that DESHAWN PETERSON knowingly possessed a firearm as a felon, in violation of Title 18, U.S.C. Section 922(g)(1), and that he committed this offense while on pretrial release, in violation of Title 18, U.S.C. Section 3147.

Kimberly Olech
Kimberly Olech
Special Agent, FBI

Subscribed and sworn
before me this 12th day of January 2021

Elizabeth A. Stafford

Honorable Elizabeth A. Stafford
United States Magistrate Judge